

Andrew S. Hudson
DC Bar No. 996294, *admitted per LR IA 11-3*
Karen S. Hobbs
DC Bar No. 469817, *admitted per LR IA 11-3*
FEDERAL TRADE COMMISSION
600 Pennsylvania Ave., NW, CC-8528
Washington, DC 20580
(202) 326-2213 / ahudson@ftc.gov
(202) 326-3587 / khobbs@ftc.gov

Attorneys for Plaintiff
Federal Trade Commission

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

INTERBILL, LTD. *et al.*

Defendants.

Case No. 2:06-CV-1644-JCM-PAL

**STIPULATION TO EXTEND
HEARING DATE FOR
EMERGENCY MOTION FOR
PROTECTIVE ORDER BY
DEFENDANT THOMAS WELLS,
MOVANT PRIORITY PAYOUT
CORP.
(First Request)**

IT IS HEREBY STIPULATED by and between the parties, Plaintiff Federal Trade Commission (“FTC”), Defendant Thomas Wells, and Movant Priority Payout Corp. (collectively “the Parties”), by and through their respective counsel of record, that the date for the hearing on the Emergency Motion for Protective Order [ECF No. 62], currently set for November 6, 2018, should be continued for a period of at least 45 days. The Parties are engaged in active settlement discussions regarding a final order that would resolve all matters in dispute between them. A continuance of the hearing would allow the Parties to focus on their negotiations, and avoid the expenditure of time and resources—both the Parties’ and the Court’s—on a dispute that settlement would render moot. Thus there is good cause for the Court to continue the hearing.

1 This is the Parties' first stipulation and request to extend the hearing date, and is not sought for
2 reasons of delay or for any improper purpose.

3 IT IS FURTHER STIPULATED that the Parties shall have the option to appear for the
4 hearing on the Emergency Motion for Protective Order by telephone.

5
6 **SO STIPULATED AND AGREED:**

7 **FOR PLAINTIFF:**
8 **FEDERAL TRADE COMMISSION**

9
10 /s/ Andrew S. Hudson
11 ANDREW S. HUDSON
12 KAREN S. HOBBS
13 Federal Trade Commission
14 600 Pennsylvania Ave., NW
15 Mailstop CC-8528
16 Washington, DC 20580
17 (202) 326-2213 / ahudson@ftc.gov
18 (202) 326-3587 / khobbs@ftc.gov
19 *Attorneys for Plaintiff*

Date: November 2, 2018

20
21 **FOR DEFENDANT AND MOVANT:**

22 /s/ Theodore F. Monroe (with permission)
23 J. MALCOLM DEVOY, ESQ.
24 DeVoy Law P.C.
25 2575 Montessouri Street, Suite 201
26 Las Vegas, NV 89117
27 (702) 706-3051 / ecf@devoylaw.com

Date: November 2, 2018

28 THEODORE F. MONROE, ESQ. (admitted *pro hac vice*)
The Law Offices of Theodore F. Monroe
800 West 6th St., Suite 500
Los Angeles, CA 90017
(213) 233-2272 / monroe@tmflaw.com
*Attorneys for Defendants Thomas Wells
and Interbill, Ltd. and its successor,
Priority Payout Corp.*

1 **ORDER**

2 For good cause appearing, the Parties' foregoing stipulation is GRANTED. It is
3 **ORDERED** that the hearing scheduled in this matter for November 6, 2018 at 1:45 p.m. is
4 **VACATED**, and such hearing is re-set to the date and time set forth below:

5
6 Date: January 8, 2019 Time: 1:45 p.m., in Courtroom 3B

7
8 Additionally, the Parties' counsel shall have permission to appear telephonically at this
9 rescheduled hearing, and shall make arrangements with chambers for such
10 telephonic appearances before the hearing date by contacting Jeff Miller at (702) 464-5570 no
11 later than 4:00 p.m. January 4, 2019.

12 Dated this 2nd day of November, 2018.

13
14
15 
16 UNITED STATES MAGISTRATE JUDGE
17
18
19
20
21
22
23
24
25
26
27
28